



MYSTIC RIVER WATERSHED ASSOCIATION
20 ACADEMY STREET, SUITE 203
ARLINGTON, MA 02476

PHONE: 781-316-3438 • FAX: 781-641-2103
WEBSITE: WWW.MYSTICRIVER.ORG

July 10, 2008

Secretary Ian A. Bowles
Analyst William Gage
Executive Office of Environmental Affairs
Attention MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

**RE: Comments regarding the Environmental Notification Form
for the Winchester Hospital project at
620 Washington Street, Winchester, MA;
EOEA Number 14264**

Dear Mr. Bowles and Mr. Gage:

The Mystic River Watershed Association (MyRWA) is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and the related natural resources throughout the watershed's 22 communities. The right of groups of citizens to challenge effectively the decisions of their community's Conservation Commissions, of MEPA, MassDEP, of FEMA and other governing bodies is important to MyRWA and its members. We therefore are respectfully submitting comments on the Phase I Waiver Request and Environmental Notification Form (ENF) for the Winchester Hospital expansion project at 620 Washington Street in Winchester, Massachusetts.

In general, MyRWA opposes any Phase I Waiver for this project. Following are the main reasons we believe this project should undergo a full Environmental Impact Report (EIR):

- **Large Project:** Simply because of the magnitude of this project (a 238,000 square-foot project on an eleven-acre site, creating a new 1.5 acres of impervious area, 800 parking spaces, over 3,000 new vehicle trips per day and altering over 85,000 square feet of wetlands), this project should have a full EIR;
- **Sensitive Environmental Area:** Because of the project's location on the Aberjona River and in a large area of sensitive wetlands, the environmental impact of such a big project should be well understood;
- **MassDEP Waste Site:** 620 Washington Street is a Massachusetts Department of Environmental Protection (MassDEP) waste site with an open Release Tracking Number (RTN 3-24919). Contaminants of concern include at least trichloroethylene (TCE), beryllium and arsenic. These constituents in the soil in the environmentally sensitive area magnify the need for an EIR;

- **Poor Past Performance of Developer:** During a 2005 parking lot project at the same Site, the developer severely impacted the resource area (including excavating the riverbank without proper erosion controls) in a manner not disclosed in the Notice of Intent, prompting corrective action by the Winchester Conservation Commission. These actions were locally well known. Because of this past performance, more regulatory and public oversight is warranted via an EIR; and
- **Public Debate:** Because there is still a significant amount of public debate about this project, an EIR would continue public involvement in a productive and constructive manner.

We strongly urge you to conclude that an EIR for this Site is needed for all the reasons outlined above.

Thank you for your time and consideration, and we look forward to hearing from you. Please feel free to contact me at cbroderick@verizon.net with any questions regarding these comments.

Cordially,
MYSTIC RIVER WATERSHED ASSN.



Caroline R. Broderick
Vice President